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May 20, 1999

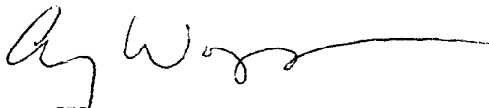
JUN - 2 1999**DOCKET FILE COPY ORIGINAL****FCC MAIL ROOM**

Office of the Secretary
 Ms. Magalie Roman Salas
 Federal Communications Commission
 445 12th Street S.W. Room TW-A306
 Washington, D.C. 20554

Dear Ms. Salas

Enclosed please find original comments for radio stations KQRS, KXXR, and KZNR/T/Z for filing in the matter referenced MN docket number 99-25. Please also find four copies of the comments for filing MN docket number 99-25.

Sincerely,



Amy Waggoner
 President and General Manager
 KQRS, KXXR, KZNR/T/Z
 Minneapolis, Minnesota

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May 20, 1999

The Honorable William Kennard
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

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FCC MAIL ROOM

Dear Mr. Chairman:

I am writing to address the issue of low power FM, or microradio, that the FCC has set forth in the January 28th Notice of Proposed Rulemaking. Although the intention of creating additional streams of public service is a noble one, it seems that this proposal is misguided.

In order to add low power FMs in most major markets, second and third channel interference protections will have to be reduced. These protections make the already crowded FM band listenable. Where is the benefit in undermining the technical integrity of the FM band and generating significant interference? Also, elimination of the second and third adjacent channel interference protection will harm radio's transition to In-Band, On-Channel digital transmission.

It seems unlikely that low power FM will accomplish the FCC objective of increasing minority and female ownership. The FCC argues that such service will improve opportunities for diverse broadcast ownership. However, due to a lack of useable frequencies, few low power FM stations would be authorized in the largest urban markets with the most diverse populations.

Radio listeners depend on local broadcasters for local news, weather, entertainment, public affairs programming, and service to the community. Current ownership does an outstanding job of meeting the public's expectations. The Minnesota Broadcasters Association reports that local radio and television stations raised more than \$19 million for charities and donated \$65 million in airtime for public service announcements from June 1996 to June 1997 (the most recent 12-month period tallied). In 1998 the local ABC, Inc. stations that I manage dedicated 300 hours to public affairs programming in the form of 30-minute weekly programs. An additional \$4 million was raised for community organizations or donated in air time for the broadcast of diverse provocative public service announcements.

I urge you and your fellow commissioners not to go forward with the implementation of low power FMs until interference issues can be properly addressed. We should not be putting access to existing high quality community programming at risk in order to bring on line a technically inferior product whose service to the community will be questionable at best.

Sincerely,

Amy Waggoner
President and General Manager
KQRS, KXXR, KZNR/T/Z